

STEPHANIE M. HINDS (CABN 154284)  
United States Attorney

THOMAS A. COLTHURST (CABN 99493)  
Chief, Criminal Division

SUSAN KNIGHT (CABN 209013)  
Assistant United States Attorney

150 Almaden Boulevard, Suite 900  
San Jose, California 95113  
Telephone: (408) 535-5056  
FAX: (408) 535-5066  
Email: Susan.Knight@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	CASE NOS. CR 11-00683 BLF
	)	CR 12-00426 BLF
Plaintiff,	)	
	)	[CASES RELATED ON JULY 15, 2021]
v.	)	
	)	
CHRISTOPHER DOYON,	)	
	)	
Defendant.	)	

UNITED STATES OF AMERICA,	)	CASE NO. CR 22-00099 EJD
	)	
Plaintiff,	)	[FILED MARCH 9, 2022]
	)	
v.	)	NOTICE OF RELATED CASE IN A CRIMINAL
	)	ACTION
CHRISTOPHER DOYON,	)	
	)	
Defendant.	)	

The United States of America, pursuant to Local Criminal Rule 8-1, hereby notifies the Court that the three above-captioned criminal cases are related.

On September 21, 2011, defendant Christopher Doyon was charged with one count of conspiracy to cause intentional damage to a protected computer, in violation of 18 U.S.C. § 1030(b) and

(c)(4)(A)(i)(I), and one count of intentional damage to a protected computer, aiding and abetting, in violation of 18 U.S.C. §§ 1030(a)(5)(A), (c)(4)(A)(i)(I), (c)(4)(B)(i) & 2. *See* CR 11-00683 BLF, ECF No. 1. The charges stem from his participation in a conspiracy to launch a Distributed Denial of Service (DDoS) attack against Santa Cruz County's computer servers on Dec. 16, 2010. He was arrested on September 22, 2011 and released on conditions. *See id.* at ECF Nos. 3, 8.

On February 2, 2012, the defendant failed to appear at a status conference before the Honorable Lowell D. Jensen, who issued an arrest warrant but stayed it until a status conference on February 16, 2012. *See id.* at ECF Nos. 25, 27. The defendant again failed to appear and his counsel reported to the Court that the defendant had fled to Canada and an arrest warrant was issued. *See id.* at ECF No. 27. On May 30, 2012, the defendant was indicted for failing appear, in violation of 18 U.S.C. § 3146(a)(1). *See* CR 12-00426 BLF, ECF No. 1

In June 2021, the defendant was apprehended and made an initial appearance in both criminal cases in the Northern District of California. *See* CR 11-00683 BLF, ECF No. 95. On July 15, 2021, the Honorable Beth Labson Freeman found that both cases were related. *See id.* at ECF No. 105.

The parties have reached a resolution that includes a guilty plea to the above-referenced charges and charges filed in the Middle District of Florida (MDFL). The Florida matter has been transferred via Rule 20 to the Northern District of California and assigned case number CR 22-00099 EJD. The MDFL Indictment charged the defendant with seven counts of intentional damage to a protected computer, in violation of 18 U.S.C. § 1030(a)(5)(A), (b), (c)(4)(B) and 2, and stem from his participation in DDoS attacks on the City of Orlando and other entities in retribution for a local ordinance prohibiting distribution of food to more than 25 people at any Orlando park without a permit.

Based upon these facts, the above-captioned cases are related within the meaning of Local Rule 8-1(b)(1) because they involve the same defendant and the similar events. Furthermore, the cases are related within the meaning of Local Rule 8-1(b)(2) because, if heard by separate judges, the actions likely would involve substantial duplication of labor by the two judges.

//

//

//

1 Per the requirement of Local Criminal Rule 8-1(c)(4), government counsel states that assignment  
2 of these cases to a single judge is likely to conserve judicial resources and promote an efficient  
3 determination of each action.

4 DATED: March 9, 2022

Respectfully submitted,

5 STEPHANIE M. HINDS  
6 United States Attorney

*Susan Knight*

7  
8 

---

SUSAN KNIGHT  
Assistant United States Attorney